

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
CHINEDUM ADINDU	:	VIOLATIONS: 18 U.S.C. § 1542 (making false statements in a United States passport application - 1 count) 18 U.S.C. § 911 (false claim of United States citizenship - 1 count) 18 U.S.C. § 1028(a)(4) (false identification document - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about October 24, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

CHINEDUM ADINDU,

an alien and citizen of Nigeria, knowingly and willfully made false statements in an application for a United States passport, with intent to induce and secure for his own use, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant ADINDU stated that he was a person identified here as TD, that he was born in Baltimore, Maryland, and that he was a United States citizen, which statements he knew to be false.

In violation of Title 18, United States Code, Section 1542.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about October 24, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, the defendant

CHINEDUM ADINDU,

an alien and a native and citizen of Nigeria, falsely and willfully represented himself to be a
citizen of the United States.

In violation of Title 18, United States Code, Section 911.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about October 24, 2007, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

CHINEDUM ADINDU

knowingly possessed the following identification documents, other than ones issued lawfully for
his use, with the intent such documents be used to defraud the United States:

- 1) A State of Maryland Identification Card in the name of TD; and
- 2) A State of Maryland Certificate of Live Birth in the name of TD.

In violation of Title 18, United States Code, Section 1028(a)(4).

PATRICK L. MEEHAN
United States Attorney